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October 30, 2015

The Honorable William H. Orrick  
United States District Court  
Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: *National Abortion Federation v. Center for Medical Progress, et al.*  
Case No. 3:15-cv-03522

Dear Judge Orrick:

Defense counsel have received this Court's order stating it received no response to NAF's letter of October 22, 2015, requesting leave to depose Charles Johnson and that Mr. Daleiden be ordered to turn over all copies of all materials covered by the TRO to outside counsel for CMP. The Court granted these requests.

It was not defense counsel's understanding that NAF's letter was to be considered as a motion requiring a response. In light of this court's earlier admonitions about complying with the local rules and the court's standing orders, we were awaiting direction from the court on how to proceed in the face of NAF's unorthodox letter request for substantive relief.

Defendant Daleiden requests an opportunity to file a response to NAF's letter of October 22.

Respectfully,

/s/

Catherine Short